
Central Coast Regional Water Quality Control Board

October 7, 2013

Mr. Dave Flynn
Deputy Director of Public Works
San Luis Obispo County
County Government Center, Room 207
San Luis Obispo, CA 93408
Email: dflynn@co.slo.ca.us

Dear Mr. Flynn:

CONSTRUCTION DEWATERING DISPOSAL ACTIVITIES, LOS OSOS WATER RECYCLING PROJECT, SAN LUIS OBISPO COUNTY

Central Coast Water Board staff received your August 21, 2013 letter responding to our August 7, 2013 letter regarding the Los Osos Wastewater Project Construction Dewatering Plans (W.A. Rasic and ARB). We appreciate the time, information, and clarification San Luis Obispo County staff has provided thus far. A follow-up meeting with County staff on September 20, 2013, facilitated our understanding of the County's process for evaluating the feasibility of land disposal options (costs, location and distance, energy costs, timing and availability, area disturbance, etc.). This letter reiterates our requirements and provides additional guidelines regarding the discharge of construction dewatering.

In our May 27, 2011 letter, the Water Board required the County to consider discharge minimization and disposal to land as priorities before to discharging to surface water. Our expectation was that the County would evaluate the timing, environmental impacts, and technical and cost considerations of land disposal options prior to surface water discharges. In your August 21, 2013 letter and at the September 20, 2013 follow-up meeting, County staff further expanded on the feasibility of land disposal options. We agree that the County has carefully and thoughtfully evaluated options to dispose of accumulated water to land. We agree that, in some cases, land disposal was or is not feasible due to various factors, including 1) lack of capacity at existing land disposal locations, 2) the distance and infrastructure needed to route accumulated water to existing land disposal locations, 3) the availability and timing of additional land disposal locations (i.e., Broderson leach field), 4) the energy costs associated with pumping water to existing land disposal locations, and 5) the disturbance associated with routing water throughout the community. Based on these considerations and the County's ability to provide this information to Water Board staff, we agree that surface water discharges are appropriate in some cases. We understand that this evaluation process is dynamic and options may change as the project progresses. We also understand that existing land disposal locations are being used to the best extent possible and that new land disposal opportunities may arise, such as the use of the Broderson leach field.

JEFFREY S. YOUNG, CHAIR | KENNETH A. HARRIS JR., EXECUTIVE OFFICER

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In addition, we acknowledge that two contractors are working in various areas of Los Osos with different phases of construction. These areas have their individual site constraints and require separate evaluations to address discharges of accumulated water. It should be noted that the County continues to and is required to comply with all of the existing requirements identified in the General Waiver (Resolution No. R3-2008-0010) enrollment letter dated May 20, 2013, as well as the Construction General Permit (Order No. 2009-0009-DWQ with amendments).

Per our recent discussions on September 20, 2013, we anticipate that the County will continue to evaluate land disposal options based on infrastructure costs, disposal site location and distance, energy costs to move water, disposal site timing and availability, area disturbance due to routing water, and any other environmental or water quality considerations, as discussed above. We are encouraged that the County is moving towards using the Broderon leach field site for future land disposal activities. According to our recent discussion, the Broderon leach field should be ready in the coming month. County staff explained that a connection to Broderon requires additional evaluation prior to its use, such as pumping considerations to move the water uphill and maintain a flow that will not erode or damage the integrity of the leach field. It also requires installation of underground piping through high groundwater areas. Central Coast Water Board staff encourages County staff to move expeditiously to use the Broderon leach field site.

For discharges to surface water, we expect that the County will continue to adhere to the requirements of the Construction General Permit. In addition, if possible, the County should direct surface water discharges to areas of existing natural seepage and naturally vegetated areas. Discharges to existing seeps or springs will allow for fresh water blending and will augment areas with low water due to lack of rain. Discharges to natural vegetated areas will increase the natural filtration process through overland flow prior to contacting the bay.

The Central Coast Water Board anticipates continued collaboration and communication as the project progresses. We continue to support the project and are encouraged that construction activities are planned with the goal of successful project completion while protecting water quality. If you have any questions or comments, please call **David LaCaro at 805-549-3892 or email at dlacaro@waterboards.ca.gov**.

Sincerely,

Michael Thomas

Digitally signed by Michael Thomas
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Michael Thomas
Assistant Executive Officer

cc:

John Waddell, San Luis Obispo County, Los Osos Project Manager (jwaddell@co.slo.ca.us)

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